

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 7
	§	
WITH PURPOSE, INC.	§	CASE NO. 23-30246-mvl7
	§	
Debtor.	§	

SEVEN TALENTS, LLC, RHYTHMIC CAPITAL FUND II, LLC, AND J.I.G., LLC,	§	
	§	
	§	
Plaintiffs,	§	
	§	ADV. NO. 23-03032-mvl
v.	§	
	§	
TOBY NEUGEBAUER and BANZAI ADVISORY GROUP, LLC,	§	
	§	
Defendants.	§	

PLAINTIFFS' MOTION TO REMAND AND ABSTAIN

Pursuant to 28 U.S.C. §§ 1334(c) and 1452(b), Plaintiffs Seven Talents, LLC, Rhythmic Capital Fund II, LLC, and J.I.G., LLC (collectively, "Plaintiffs") hereby move this Court for an order remanding this action to the state court in which it was originally filed.

Pursuant to Rule 7007-1(d) of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, the grounds, contentions of facts and law, and argument and authorities supporting Plaintiffs' request for this Court to grant their motion to remand and/or abstain and send this lawsuit back to the state court in which it was originally filed are set forth in the separate brief being filed concurrently herewith.

Respectfully submitted,

/s/ Chase J. Potter

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This certifies that a true and correct copy of the above and foregoing instrument was served on the Parties' counsel of record pursuant to the Rules, on this 12th day of May 2023 addressed as follows:

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/s/ Chase J. Potter

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CHASE J. POTTER

CERTIFICATE OF CONFERENCE

I hereby certify that, on May 12, 2023, I conducted a telephonic conference with counsel for Defendants (Clay Taylor) regarding the issues presented in this Motion, and Mr. Taylor confirmed that Defendants are opposed to the relief requested in this Motion.

/s/ Chase J. Potter

CHASE J. POTTER